

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KAREN COCHENOUR, individually and on)	
behalf of others similarly situated,)	
)	
Plaintiff,)	
)	Civil Action No. 1:25-CV-00007-DII
v.)	
)	
360TRAINING.COM, INC., D/B/A)	
MORTGAGE EDUCATORS AND)	
COMPLIANCE, INC.,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule CV-7 of the U.S. District Court for the Western District of Texas, Defendant 360training.com, Inc., d/b/a Mortgage Educators and Compliance, Inc. (“360training”) hereby submits this Unopposed Motion for Extension of Time to Answer and Otherwise Respond and respectfully requests that the Court grant a 30-day extension for 360training to answer or otherwise respond to Plaintiff Karen Cochenour’s (“Plaintiff”) Class Action Complaint (“Complaint”). In support of this Motion, 360training respectfully states as follows:

1. Plaintiff filed the Complaint on January 2, 2025. (Dkt. No. 1.)
2. 360training was served with the Complaint on January 6, 2025, making its responsive pleading deadline January 27, 2025.
3. 360training recently retained outside counsel to handle this matter, who requires additional time to investigate the allegations and prepare an appropriate response to the Complaint.

4. Counsel for 360training.com has conferred with Plaintiff's counsel, and Plaintiff does not oppose the requested extension.

5. The extension requested herein is for good cause and is not for the purposes of delay or other improper purpose. Accordingly, the requested extension will not prejudice the orderly administration of this matter and will promote judicial efficiency.

6. No deadlines have been set in this case, so the requested extension will not have any impact on other case deadlines.

WHEREFORE, Defendant 360training.com, Inc. respectfully requests that the Court extend the deadline for 360training to answer or otherwise respond to Plaintiff's Complaint by 30 days, from January 27, 2025 up to and including February 26, 2025.

Dated: January 24, 2025

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/Rachel Palmer Hooper

Rachel Palmer Hooper
Texas Bar No. 24039102
811 Main Street, Suite 1100
Houston, Texas 77002
Tel: 713.646.1329
Fax: 713.751.1717
rhooper@bakerlaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date, January 24, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Rachel Palmer Hooper